

**REQUIRED STATEMENT**  
**TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

Debtor Keisha L Malec, Case No 20-16937 Chapter 13  
Moving Creditor LoanCare, LLC as servicing agent for Date Case Filed September 11, 2020  
Lakeview Loan Servicing, LLC

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe): \_\_

Chapter 13 Date of Confirmation Hearing Date Plan Confirmed January 08, 2021

1. Collateral
  - a. ☒ Home
  - b. ☐ Car \_\_\_\_\_
  - c. ☐ Other (describe) \_\_\_\_\_
2. Balance Owed as of May 25, 2021 \$272,367.72  
Total of all other Liens against Collateral \$0.00 (per debtor's schedule)
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$280,385.00 (per Debtor's Schedules)
5. Default
  - a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b. ☒ Post-Petition Default
    - i. ☒ On direct payments to the moving creditor  
Number of months 8 Amount \$20,227.68 (including attorney's fees and costs)
    - ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. ☒ Lack of Adequate Protection § 362(d)(1)
    - i. ☐ No insurance
    - ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_
    - iii. ☐ Rapidly depreciating asset
    - iv. ☒ Other (describe) Material payment default
  - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
  - c. ☐ Other "Cause" § 362(d)(1)
    - i. ☐ Bad Faith (describe) \_\_\_\_\_
    - ii. ☐ Multiple Filings
    - iii. ☐ Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: June 9, 2021

Submitted By:

/s/Dana O'Brien

ARDC# 6256415

McCalla Raymer Leibert Pierce, LLC